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February 21, 2025

Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 20C
New York, New York 10007

RE: Candice Gronberg v. Sensio Company (Us) Inc., et al
Case No. 24-cv-00387


Dear Judge Engelmayer:

Pursuant to Local Civil Rule 37.2, Plaintiff hereby requests a pre-motion discovery conference with the Court. Plaintiff propounded ESI discovery on Defendants on October 1, 2024. Defendants objected to producing documents but noted in their objection "Sensio will negotiate an amended version of the list of custodians and search terms to ensure that the resulting production will be tailored and proportional to the needs of the case." Counsel has been diligently working together and Plaintiff agreed to the last set of search terms that were proposed by Defense Counsel. To date, Defendants have failed to provide the responsive documents.

Additionally, Plaintiff's counsel has requested dates for depositions of corporate representatives which have gone unanswered by Defense Counsel.

Prior to seeking judicial resolution of these pretrial disputes, Plaintiff attempted to confer in good faith in an effort to resolve the disputes. There are fast approaching deadlines and Plaintiff is severely prejudiced by Defendants' failure to produce all of the requested ESI discovery and deposition dates.

We thank Your Honor for this Court's consideration.


Jason Turchin, Esq.

cc: Counsel for Defendants via CM/ECF

Defendants' reply is due February 26, 2025.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

February 21, 2025
New York, New York